

areas. Examining costs on a large geographic basis such as today's study areas for large LECs serves to hide high-cost areas within those boundaries because they are averaged with lower cost markets. Requiring incumbent LECs to continue the implicit support flows, from charging higher prices in low-cost areas, creates inflated pricing umbrellas for competitors that may choose not to serve high-cost areas. To achieve the Section 254 goal of eliminating implicit support between low-cost and high-cost areas, universal service areas must be small enough to recognize high-cost areas without being so small that administration becomes excessive. A universal service area no smaller than a wire center level and no larger than a basic local calling area is a reasonable geographic area over which to examine high costs.

VIII. The Need for Capital Recovery by Incumbent LECs

Several parties besides SWBT recognized the incumbent LECs' under-recovered embedded plant, invested under tacit assurances that regulators would eventually permit its recovery, still needs to be recovered.³³ In order for support to be "sufficient" these incumbent LEC costs must be addressed.³⁴ A separate, explicit support mechanism for this depreciation catch-up should be adopted, rather than including it in a catch-all support fund. This support should not be portable.³⁵ An "amortization" period of approximately five years should be used. Average remaining lives can fluctuate over time, depending on the pace of advances in technology, customer adoption of new services, and competitive entry. A fixed amortization

³³ See, e.g., NECA, pp. 10-11; BellSouth, p. 7 n.10, p. 14 n.25; U S West, pp. ii, 4 n.4, 11 n.25; GVNW Inc./Management, p. 6; Cincinnati Bell Telephone, pp. 11-12; and GTE, pp. 15-16 n.30.

³⁴ See NECA, pp. 10-11.

³⁵ BellSouth, p. 14 n.25; Cincinnati Bell, p. X.

period would allow for consistency among the jurisdictionally-separate capital recovery funds. Such an arrangement would prevent any unintended duplication of support amounts related to under-depreciation, and facilitate the termination of this capital recovery fund once the predetermined amounts have been recovered by the incumbent LECs.³⁶

Revenue neutral rate rebalancing would generally not accomplish this depreciation catch-up. A major portion of this under-recovery has never been implicitly or explicitly included (or recovered) in any existing rates.³⁷ Rebalancing of rates incorrectly assumes that the recovery was already occurring in some rates.

IX. Toll Restriction

A number of commenters recommend that toll restriction be included in the definition of basic universal service.³⁸ Instead, toll restriction should be made a part of the optional services

³⁶ To keep the proposed explicit capital recovery funds from duplicating any other support mechanisms, the other support mechanisms and the rebalancing of rates would necessarily be based upon levels of ongoing depreciation expense that instantly assume the completion of the entire depreciation catch-up. This approach is identical to that used by this Commission, in the past, in the simultaneous prescription of remaining life depreciation rates and a reserve deficiency amortization. This approach uses actual investment levels, rather than hypothetical investment levels.

³⁷ It is possible that some small amount of depreciation catch-up does exist in present rates. In this proceeding, SWBT has proposed a total depreciation catch-up based upon a theoretical reserve calculation. In SWBT's proposal, the total catch-up (i.e., deficiency) to be recovered through the jurisdictionally-separate capital recovery funds would be the difference between the theoretical reserves (based upon economic plant lives) and the book reserves. To the extent that past regulatory prescriptions of plant lives have built some degree of the needed catch-up into depreciation rates, and to the extent that those depreciation rates were used in establishing price levels for price cap LECs or rate of return LECs, then some small part of the needed catch-up could exist in present rates. The balance of the needed catch-up, consistent with economic plant lives, has not been included in any present rates.

³⁸ See, e.g., Ohio Consumers' Counsel, p. 17; Wyoming Public Service Commission, p. 7; Edgemont Neighborhood Coalition, pp. 16-18.

that the eligible carrier and the State commission should consider to retain customers on the public network. As the record in CC Docket 95-115 illustrated, the LEC industry and the State commissions have taken on the responsibility of keeping customers connected to the network and assisting customers who find themselves with toll bill financial difficulties.³⁹ SWBT and several other LECs are in the process of developing and implementing toll management billing systems which will allow for better management of end-user toll expenditures. Implementation of these toll management systems, coupled with interstate toll price reductions resulting from adoption of the USTA plan, will further help to retain customers on the network without additional federal mandates.

X. Incremental Step

If the Joint Board and the Commission are unable to adopt all of the provisions of the USTA plan in this proceeding, then instead of adopting proposals that contain serious flaws or that rely on unproven or seriously inaccurate cost methods (such as the Benchmark Cost Model or proxies), the following relatively simple, reliable components of the USTA plan should be used:

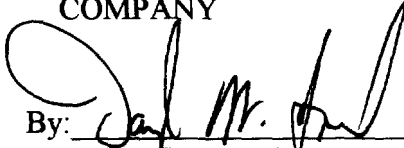
- Increase the residence and single-line business SLC cap gradually, for example, over four years, to \$6.00 per month.
- Reduce CCL on a revenue-neutral basis to coincide with the SLC increases. Bulk bill the CCL to IXCs during the transition (i.e., until the SLC increases are completed).
- At the end of the transition, place any remaining Common Line cost recovery into the Federal universal service high-cost fund.
- Expand and explicitly fund Lifeline.

³⁹ See USTA Reply Comments in CC Docket 95-115, p. 2.

- Establish target rate levels above which basic local exchange service (and the related interstate rate elements) would be deemed unaffordable and above which high-cost support would be required.
- Determine costs based on a simplified version of the Part 36 Rules and procedures that define loop costs. (All eligible carriers would be able to comply with these simplified loop cost rules.)
- Require funding of the high-cost fund by all telecommunications providers through an explicit surcharge on each provider's retail interstate telecommunications revenues.
- Universal service fund amount would be determined by loop costs not recovered by SLC.

Respectfully submitted,

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The Fallacy of Pricing at Incremental Cost

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It is neither economically appropriate nor consistent with the Telecommunications Act of 1996 ("The Act") to price interconnection, or any other telecommunications services, at incremental cost. Neither is it appropriate to fund Universal Service in an amount which fails to contribute to the joint and common costs of the universal service provider.

Incremental cost is the *difference* in the cost of a firm which provides a specified scale and scope of services and the cost of that same firm with a modified scale or scope of services. Sometimes, the modified scale and scope of services specifies that a service under consideration is not offered by the firm. This is sometimes called the "total service" incremental cost. It is well known within the economics literature and within the telecommunications industry that multiservice firms, such as telephone companies, have substantial economies of scale and scope. This logically implies that the sum of the incremental costs of the services offered by a firm will not equal (and in practice will fall well short of) the total cost of operating the firm. Thus, a multiservice firm operating in a competitive environment, or a financially viable firm operating in a regulated environment, will have prices for its products and services which exceed significantly incremental cost. This fact is largely undisputed within the telecommunications industry.

The economics literature clearly establishes that the "joint and common costs" of the firm (those costs of the firm not contained in the sum of its incremental costs) will be compensated with varying mark-ups over incremental cost for each of the products and services offered by the firm. These mark-ups generally depend on demand conditions, not cost formulas, in competitive markets. While data may not exist today to quantify the mark-ups over incremental cost for local exchange services, the qualitative conclusion that each service should contribute something towards such costs is inescapable. This conclusion pertains to: retail services and wholesale services; services sold to end-users and those sold to other providers who in turn compete with the local exchange company; and universal services as well.

The Act clearly establishes that competition should prevail in disciplining behavior within the telecommunications market wherever competitive conditions exist. The Act also implies that, when regulatory intervention is necessary, the outcome of regulation should be as compatible as possible with competitive market outcomes. For example, the Act appears to conclude that universal service policies may be jeopardized were market prices to prevail (especially in high cost areas). Thus, the Act allows for an explicit subsidy to make up the difference between market prices and mandated prices, and in doing so, it allows for a reasonable contribution towards joint and common costs. This is entirely consistent with market outcomes. One should assume that the same intentions prevail with respect to the pricing of interconnection, unbundled elements, and wholesale services.

Section 254 (k) of the Act, consistent with competitive market outcomes, allows that "...universal service bear no more than a reasonable share of joint and common costs of the facilities used to provide those services." This portion of the Act has two important implications. First, it is recognized that "joint and common costs" exist in telecommunications and, as such, must be recovered. It is particularly

noteworthy that universal services are not exempted, just as market prices would allow. Second, the phrase “joint and common costs” should be taken to mean those costs which have *not* been traditionally included in service-specific incremental cost studies. Universal services, like all other services, should contribute to the joint and common costs of the provider. Pricing universal services, or other services, at incremental cost precludes the proper contribution to recover a reasonable share of joint and common costs.

Incremental cost studies, as discussed earlier, identify the difference in the cost of a firm with and without a service, *all other things equal*. Among the things held equal in this cost calculation is the geographical scope of the local exchange company’s service offerings (the past franchise obligations of the firm have been respected in these studies).

For the first time, the Act has brought such an assumption into question. As a LEC may, under guidelines yet to be determined, increase, decrease, or transfer its universal service obligations, the assumption of a fixed service territory may be relaxed. This change will cause costs previously identified as joint and common to become incremental to the universal service obligation itself. That is, just as small LECs have small joint and common costs while large LECs have large joint and common costs, these costs will *vary* with the size of the universal service obligation. Thus including some service “joint and common costs” in the universal service obligation will have the effect of capturing those joint and common costs “...of the facilities used to provide those services” (*i.e.*, those costs caused by expanding the universal service obligation).

Section 252 (d) (1), which specifies pricing standards for interconnection and network element charges, says that such charges shall be “based on cost”, shall be “nondiscriminatory”, and “may include a reasonable profit”. In light of the above discussion, the phrase “based on cost” should be considered to include all costs of an efficiently operating company. That is, competitive markets drive prices towards cost only in the sense that the firm’s total costs, efficiently incurred, will be compensated by the prices of items sold by the firm, including a reasonable profit commensurate with the return on equity necessary in comparably risky businesses. The phrase “based on cost” should not be interpreted to mean that prices should equal incremental cost for each interconnection service or network element sold. Such a pricing practice would be entirely inconsistent with market prices and could not conceivably be consistent with the Act’s emphasis on competitive markets and competitive outcomes.

While it is not possible to calculate or prove what level of contribution should be obtained by setting prices in excess of incremental cost, the Act clearly places the authority and obligation in the hands of state commissions to resolve such issues in arbitration (Section 252 (b) (4)). When requested to arbitrate differences arising in negotiations, the state commission may determine “the just and reasonable” amount of contribution to be obtained from interconnection services and network elements in order that the local exchange company have an opportunity to recover its entire cost of producing and distributing its services. Similarly, the state commission may (and should) include a reasonable contribution towards joint and common costs in universal service funding in order to achieve the competitive outcome which is encouraged by the Act. These positions are supported by accepted and related academic literature.

CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing
Reply Comments of Southwestern Bell Telephone Company, in
Docket No. 96-45, have been served this 7th day of May, 1996
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May 7, 1996

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